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February 21, 2001

Magalie Roman Salas
Secretary, FCC
445 12th Street, S.W.
Washington DC 20554

FEB 21 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 01-9, Verizon-Massachusetts

Dear Ms. Salas:

On Tuesday, February 20, 2001, the undersigned, together with Michael Clancy, Ed Mallett, Ed Overhuls, and numerous Covad technicians, provided a tour of the Covad Network Operation Center (NOC) in Manassas, Virginia, to the following Commission staff: Michelle Carey, Eric Einhorn, Christopher Libertelli, Praveen Goyal, Julie Veach, and Jessica Rosenworcel.

The tour permitted Commission staff to view the hundreds of millions of dollars in network investment that Covad has made to build its operational capabilities to interact with Verizon. And despite its current financial crises, Covad must devote a full time team of fourteen people solely to the job of fixing linesharing problems with Verizon – problems that have now delayed linesharing implementation for over eight months. Problems that mean that Covad must chase each and every order manually, via phone, sometimes hours for one order, while Verizon enjoys automatic processes and procedures. Verizon is in the enviable position of having to shut off linesharing-ready central offices for its own retail arm because orders are flowing in beyond capacity – at the same time Covad has to shut off central offices because it can't get a single linesharing order provisioned by Verizon through that office. Every Covad linesharing customer lost is a potential Verizon retail customer gained, so it's easy to understand why Verizon is foot-dragging in fixing Covad linesharing problems. In addition, Commission staff saw how Verizon requires Covad to "supp" linesharing orders when Verizon recertifies central offices, thus ensuring that the performance metrics will exclude all late linesharing orders as "CLEC-requested due date changes." It's a clever tactic that permits Verizon to claim near-perfect on time linesharing performance, when the truth is seen in the gross failure of Verizon to complete central office wiring for linesharing capability. In addition, in order to facilitate rapid provision of linesharing orders, when Covad is faced with a 50-order backup in a newly recertified central office, Covad will submit one trouble ticket for that office, representing all of the linesharing orders in that office (this process leads to a joint meet in the office on that ticket). Verizon again is able to skew its metrics – that single trouble ticket shows up as one ticket only, not the 50

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it should, in Verizon's metrics. Covad cannot risk submitting 50 tickets – because Verizon has been coding splitter problems as “CPE” tickets, which requires Covad to pay for those tickets.

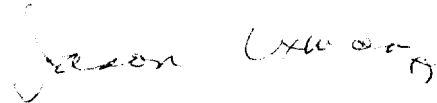
Commission staff were also able to witness the loop acceptance testing process. Covad argues that Verizon's excuse for its horrible maintenance and repair performance – that Covad is accepting loops it knows to be bad – is a feeble and inappropriate excuse. During the acceptance testing process, Covad has no way of knowing whether the Verizon technician is at the NID – where the acceptance testing process requires the technician to be. If indeed the technician is at an intermediate point on the loop, the loop will appear “good” to Covad, even if the loop is not connected to the NID, or to the drop, or even if it is connected to the wrong house or apartment. Covad would not know that the loop does not work until it rolls a truck and tries (unsuccessfully) to turn up service to its end user. At that point, Covad opens a trouble ticket. Why? Because the loop does not work. How often does this happen? According to Verizon's own metrics, upwards of four times more often for Covad customers than for Verizon's own customers. Blatant discrimination, plain and simple. The fix? Word needs to come down from “on high” at Verizon that its technicians need to clean up their performance. Instead, the only word coming down is to Verizon's federal regulatory team to come up with excuses, all in the hope that the Commission will overlook Verizon's terrible performance and permit it to enter the long distance market in Massachusetts prematurely.

Finally, Commission staff were able to view a “mock up” of Covad's central office arrangement to view exactly how Verizon improperly installs central office splitters and associated wiring. In addition, Covad explained how its collocation power arrangements work. Although two feeds (and A and a B feed) run into Covad's collocation space, and each of those feeds is in operation, each feed is designed to carry half of the power that Covad ordered. In other words, Covad orders 40 amps of power, and each feed would provision half of the power Covad orders. The only circumstance under which it could draw more is a malfunction in the equipment designed to regulate the power flow.

Although Commission staff asked to view the interim loop prequalification tool that Verizon recently made available, Covad was unable to demonstrate the tool. The tool limits the delivery of loop makeup information only to the specific Covad representative that initially requested information on that loop, so that any other Covad representative is unable to access that information. This is unlike other systems Covad has in place, which allows any Covad employee to use the circuit ID to call up records.

In addition, the tool is not “real time,” meaning it takes at least a day to return a query. Because there were no technicians at Manassas who had a query due back to them at the time of the staff’s visit, the tool could not be demonstrated. Covad did note, however, that the information provided via the tool was not parsable, and thus could not be integrated into Covad’s own OSS.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason Oxman". The signature is written in a cursive, slightly slanted style.

Jason Oxman
Senior Counsel

cc: Michelle Carey, Eric Einhorn, Christopher Libertelli, Praveen Goyal, Julie Veach,
Jessica Rosenworcel,